

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 4:23-CR-9

MARKEVEON JARICE LEMOND BROWN, DEFENDANT

PLEA AGREEMENT

The United States Attorney hereby proposes to the Court a plea agreement to be filed in this cause under Rule 11(c) of the Federal Rules of Criminal Procedure. Defendant has read and fully understands this plea agreement and approves same, realizing that the plea agreement is subject to acceptance or rejection by the Court. The plea agreement is as follows:

1. GUILTY PLEA: The defendant agrees to plead guilty under oath to Count One of the Indictment, which charges as follows:

On or about July 2, 2021, in the Northern District of Mississippi, MARKEVEON JARICE LEMOND BROWN, defendant, knowingly made a false statement and representation to Dylan Cash, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Bullfrog Corner Pawn, Inc., in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, in violation of Title 18, United States Code, Section 924(a)(1)(A).

Defendant further agrees to plead guilty under oath to Count Two of the Indictment, which charges as follows:

On or about July 3, 2021, in the Northern District of Mississippi, MARKEVEON JARICE LEMOND BROWN, defendant, knowingly made a false statement and representation to Brett Turner, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Renegade Firearms, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, in violation of Title 18, United States Code, Section 924(a)(1)(A).

Both counts carry possible penalties of not more than five years imprisonment, a \$250,000 fine, three years supervised release and a \$100 special assessment.

2. OTHER CHARGES: The United States agrees not to charge the defendant with any other offenses arising from or related to the above charge. Count Three would be dismissed upon sentencing.

3. OTHER AUTHORITIES: This agreement does not bind any prosecuting authority of any state or any other federal district, nor does it bind the Attorney General of the United States with regard to any matter, criminal or civil, involving federal tax laws. Nor does this agreement bind the United States or any of its departments or agencies with regard to any civil or administrative actions or remedies.

4. VIOLATIONS OF THIS AGREEMENT: If defendant violates this agreement, all statements made pursuant hereto will be admissible against defendant, who hereby waives the

provisions of Rule 11(f) of the Federal Rules of Criminal Procedure and Rule 410 of the Federal Rules of Evidence. Defendant may also, in that event, be prosecuted for all federal offenses, including perjury and false statements relating to this plea agreement.

5. ACKNOWLEDGMENTS: Apart from being advised of the applicability of the U.S. Sentencing Guidelines, and other than as set forth elsewhere in the plea documents, no promise or representation whatsoever has been made to defendant as to what punishment the Court might impose if it accepts the plea of guilty. This agreement fully reflects all promises, agreements, and understandings between the defendant and the United States Attorney. The defendant's agreement is knowing, free, and voluntary, and not the product of force, threat, or coercion. The defendant is pleading guilty because defendant is in fact guilty.

This the 1st day of June, 2023.


Clay Joyner
United States Attorney
MS Bar No. 10316

AGREED AND CONSENTED TO:


Markeveon Jarice Lemond Brown
Defendant

APPROVED:


Merrill K. Nordstrom
Attorney for Defendant
Mississippi Bar No. 100815